

Environmental Protection Agency  
25 APR 2017

# OCEAN FARM LTD.



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Environmental Protection Agency ,

P.O. Box 3000

EPA Headquarters ,

Johnstown Castle Estate ,

Co. Wexford



21<sup>st</sup> April 2017

**Re :- Application submitted by Sligo County Council for the disposal of dredge material at sea from capital and maintenance dredging during the period July 2017 to July 2025.**

Dear Sir or Madam,

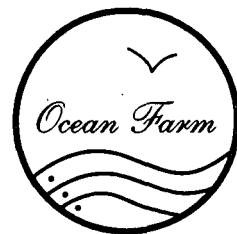
We write to you with observations and concerns in respect of the submission of an Application for the Disposal at Sea of Dredging Spoil from Sligo Harbour by Sligo County Council.

We are an Organic Salmon Farming company located in Inver Bay and McSwynes Bay both sites in Donegal Bay which we contest will be seriously impacted by the proposal.

We are very concerned that

- A. An environmental Impact Survey was not carried out on the dumpsite to assess the impact of dumping 250,000 cubic meters of dredge material in the waters close to Donegal Bay. We would insist that an EIS and in fact a NIS is required here.
- B. The timing of the dredging is for a period of 8 years. This puts uncertainty over our future for a very long period of time. 1 year should be the maximum.
- C. The modelling though quite extensive was carried out over a 1 month cycle this covers 11 tides, BUT the actual dumping will occur over 5 or 6 months because of the steaming distance and barge capacity. The modelling therefore is not representative.
- D. The Water Injection Dredging which will be carried out at "suitable tides" is not acceptable at all. As the risk of the silt and sediment re- entering the water column and being carried out to sea to remain suspended in the water resulting in threatening all wild marine life and aquaculture in the impacted area. We have first hand experience of this if the silt is suspended in the water and gets into the gills of fish trapped in aquaculture cages it can do terrible damage.

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There is an assurance that there is no risk to fish or shellfish or marine life but we would argue the opposite. Based on THE OSPAR convention it is now clear that focusing solely on toxic compounds based on concentration alone is insufficient to assess the impact of dredging spoil disposal and that other factors such as toxicity mass loading, silt load, turbidity, particle size angularity, entrainment of anaerobic sediments and bacterial and viral burden are all cumulative factors to be considered

In 2002 Killybegs Harbour was dredged and the dredge spoil was deemed suitable for disposal at sea. At that time our enterprise and many other local fishing and shell fishing and ,eye witnesses all around the coast from Sligo to Glen Head witnessed silt on gear and nets and a lot of dead fish.

Our concerns arise as we were the major enterprise that suffered the death and full financial loss associated with the fish kill of 850,000 salmon smolts of the approximate 1,000,000 smolts that died in total from all producers approximately 11 months after the last dredge dump event in 2002.

Nothing like this has happened before or since the dredging and dumping event of 2002. Only now 15 years later are we trying to get back up to full capacity. Please do not put our entire business 750,000 salmon, the employment of over 50 people and the multiplicity of ancillary service businesses at risk by allowing this application proceed in its present form.

We would ask that Water Injection Dredging not be allowed as an absolute minimum, that the silt and gravel be taken ashore and used productively or at the very least all the spoil be dumped as far out as possible but an environmental impact assessment on the dumpsite needs to be carried out and finally that all the work be carried out in 1 year not 8 years to take the uncertainty out of our future to allow for expansion of what is a fantastic home grown sustainable Irish business that can take its place on the world stage for quality sustainability and employment.

Yours Sincerely,

Anne Gallagher

Director.